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Counsel for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA MARTINEZ, an individual; and ABIGAIL ROBINSON, an individual; on behalf of themselves and all others similarly situated.

Plaintiffs,

v.

LAS VEGAS SANDS CORP., a Nevada corporation; VENETIAN CASINO RESORT, LLC, a Nevada limited liability company; and LAS VEGAS SANDS, LLC, a Nevada limited liability company d/b/a Venetian Resort Hotel Casino and Palazzo Resort Hotel Casino,

Defendants.

Case No.: 2:17-cv-02859-APG-NJK

STIPULATION AND (PROPOSED) ORDER EXTENDING DEADLINE TO RESPOND TO COMPLAINT

(First Request)

Plaintiffs Maria Martinez and Abigail Robinson (collectively "Plaintiffs") and Defendants Las Vegas Sands Corp., Venetian Casino Resort, LLC and Las Vegas Sands, LLC (collectively "Defendants"), hereby stipulate and agree as follows:

- 1. Plaintiffs commenced this action in the United States District Court, District of Nevada on November 14, 2017.
- 2. Defendants were served with the Summons and Complaint on December 22. 2017.
- 3. The deadline for Defendants to answer or otherwise plead in response to the Complaint is January 16, 2018.

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- 4. Plaintiffs and Defendants hereby stipulate and agree to extend the time for the Defendants to respond or otherwise plead to Plaintiffs' Complaint by 30 days, from January 16, 2018 to February 15, 2018.
- 5. Defense counsel was only recently retained. Defense counsel requires additional time to obtain facts in order to adequately respond to the complaint. The parties are also discussing consolidation of cases and believe the extension of time would be useful to see if an agreement is possible.
- 6. By so stipulating, none of the parties waive any claims, rights or defenses and expressly reserve all rights and defenses under Fed. R. Civ. P. 8 and 12.
- 7. This is the first extension of time requested by the parties. This Stipulation is made in good faith and not in an attempt to delay proceedings.

DATED this 12th day of January, 2018.

DATED this 12th day of January, 2018.

/s/ Don Springmeyer

Don Springmeyer (NV Bar No. 1021) Bradley Schrager (NV Bar No. 10217) Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP 3556 E. Russell Road, 2nd Floor Las Vegas, Nevada 89120 Attorneys for Plaintiffs /s/ Donald L. Prunty

DONALD L. PRUNTY, ESQ. (NV Bar No. 8230) GREENBERG TRAURIG, LLP 3773 Howard Hughes Pkwy., Suite 400N Las Vegas, Nevada 89169 Counsel for Defendants

ORDER

IT IS SO ORDERED that Defendants Las Vegas Sands Corp., Venetian Casino Resort, LLC and Las Vegas Sands, LLC shall have up to and including February 15, 2018, in which to answer or otherwise respond to the Complaint.

United States Magistrate Judge

Dated: January 16, 2018